

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CASE NO. 1:23-bk-00737 HWV**
LANE ALLEN MAYS, II :
Debtor : **CHAPTER 13**

**SECOND MOTION FOR EXTENSION OF TIME TO FILE
SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF
CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST,
PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN**

AND NOW comes Debtor, Lane Allen Mays, II, by and through his attorney, Gary J.

Imblum, and respectfully represents:

- 1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on April 2, 2023.**
- 2. Debtor filed the bankruptcy as an emergency due to a pending utility shut off scheduled for April 3, 2023 and a sheriff sale of his residence scheduled for April 11, 2023.**
- 3. Debtor's counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing. More specifically, Debtor is in the process of filing unfiled tax returns so that we can account for the tax liability/tax refunds on the Schedules.**
- 4. A Motion for Extension of Time was filed on April 17, 2023 which was approved by an Order dated April 20, 2023.**

5. Debtor's schedules are due to the Court on or before May 17, 2023.

6. It is estimated that Debtor's counsel will need an additional 30 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order extending the deadline for Debtor to file bankruptcy schedules and plan until June 17, 2023.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



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Attorney for Debtor

Dated: May 15, 2023

CERTIFICATE OF SERVICE

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing SECOND MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:

JACK ZAHAROPOULOS ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

Bernadette Davis

Bernadette A. Davis, Paralegal
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Dated: May 15, 2023

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IN RE:	:	CASE NO. 1:23-bk-00737 HWV
LANE ALLEN MAYS, II	:	
Debtor	:	CHAPTER 13

ORDER

Upon consideration of Debtor's Second Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,

**IT IS HEREBY ORDERED AND DECREED that the deadline for filing the
aforementioned pleadings in the above captioned case is extended through June 17, 2023.**